

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

KINGSLEY R. CHIN,
ADITYA HUMAD, and
SPINEFRONTIER, INC.,

Defendants

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Criminal No. 1:21-cr-10256-RWZ

JOINT INTERIM STATUS REPORT

Pursuant to Local Rule 116.5(b), the parties hereby file the following joint interim status report prepared in connection with the status conference scheduled for July 11, 2022.

1) Automatic Discovery

The government provided automatic discovery to the defendants on October 29, 2021 and has made supplemental discovery productions on December 10, 2021, January 10, 2022, and February 17, 2022.

On June 15, 2022, the government provided an additional supplemental discovery production containing, among other items, a large volume of electronic data—including text message records and other electronic documents—from a laptop computer and three cell phones belonging to two non-parties.

2) Additional Discovery

At this time, the government does not anticipate producing supplemental discovery. The government will provide additional discovery to the defendants if it receives or identifies additional discoverable documents.

3) Timing of Additional Discovery Requests

The defendants have not submitted any discovery requests to the government to date. The defendants are continuing to review discovery and, at this time, reserve the need for further discovery requests.

4) Protective Orders

The Court has entered a protective order in this matter. *See* Dkt. No. 37.

5) Pretrial Motions

The defendants have not filed any pretrial motions under Fed. R. Crim. P. 12(b).

6) Expert Discovery

The parties agree that deadlines for expert disclosures should be established at a later date.

7) Defenses of Insanity, Public Authority, or Alibi

None of the defendants presently intends to assert a defense of insanity, public authority, or alibi.

8) Speedy Trial Act

All time has been excluded under the Speedy Trial Act from the date of the defendants' arraignments through July 11, 2022.

The parties request that the time be excluded from July 11, 2022, until the next conference or hearing in this matter.

9) Status of Plea Discussions and Likelihood of Trial

None of the defendants has expressed an intention to plead guilty. The parties estimate that a trial in this matter would last three to five weeks.

10) Next Status Conference

Given the foregoing information, the parties request that the status conference scheduled for July 11, 2022, be canceled. The parties request that a status conference be scheduled in approximately 60 days.

Respectfully submitted,

KINGSLEY R. CHIN

By his attorney,

/s/ William D. Weinreb

William D. Weinreb

Quinn Emanuel Urquhart & Sullivan, LLP

111 Huntington Avenue

Suite 520

Boston, MA 02199

617-712-7100

billweinreb@quinnemanuel.com

ADITYA HUMAD

By his attorney,

/s/ Frank A. Libby, Jr.

Frank A. Libby, Jr.

Libby Hoopes Brooks, P.C.

399 Boylston Street, Suite 600

Boston, MA 02116

617-338-9300

falibby@lhblaw.com

SPINEFRONTIER, INC.

By its attorney,

/s/ William D. Weinreb

William D. Weinreb

Quinn Emanuel Urquhart & Sullivan, LLP

111 Huntington Avenue

Suite 520

Boston, MA 02199

617-712-7100

billweinreb@quinnemanuel.com

UNITED STATES OF AMERICA,

By its attorney,

RACHAEL S. ROLLINS

United States Attorney

/s/ David J. Derusha

PATRICK CALLAHAN

DAVID J. DERUSHA

ABRAHAM R. GEORGE

CHRISTOPHER LOONEY

Assistant U.S. Attorneys

1 Courthouse Way

John Joseph Moakley U.S. Courthouse

Boston, MA 02210

(617) 748-3100

david.derusha@usdoj.gov

Dated: July 6, 2022

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ David J. Derusha

David J. Derusha

Assistant United States Attorney

Dated: July 6, 2022